

1 **D. MAX GARDNER, ESQ. (CSB No. 132489)**
2 **930 Truxtun Ave., Suite 203**
3 **Bakersfield, CA 93301**
4 **661-864-7373 tel.**
5 **661-864-7366 fax**
6 **dmgardner@dmxlaw.com**

7 Attorney for Chapter 7 Trustee Jeffrey M. Vetter

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10 **UNITED STATES BANKRUPTCY COURT**
11 **EASTERN DISTRICT OF CALIFORNIA**

12 IN RE:

13 TEMBLOR PETROLEUM COMPANY, LLC.

14 DEBTOR.

Bankruptcy Case No.: 2020-11367

Chapter 7

DMG-7

15
16 **MOTION TO FURTHER EXTEND DEADLINE TO ASSUME**
17 **EXECUTORY CONTRACTS AND LEASES**

18 TO THE HONORABLE JENNIFER E. NIEMANN, UNITED STATES
19 BANKRUPTCY JUDGE:

Chapter 7 Trustee Jeffrey Vetter ("Trustee") represents as follows:

20 1. Debtor filed a voluntary petition under Chapter 11 of the United States Bankruptcy
21 Code on April 9, 2020. This case converted to Chapter 7 on May 5, 2021. Jeffrey M. Vetter is
22 the acting Chapter 7 Trustee in this case.

23 2. Among the assets of the estate are the Debtor's non-operator interests in various oil
24 and gas leases that are attached as exhibits to Debtor's Schedule "G" and that are associated
25 with what the Debtor describes as the "Witter Field Project". A true and correct copy of

26 FURTHER MOTION TO EXTEND DEADLINE TO ASSUME OR REJECT EXECUTORY CONTRACTS AND
27 LEASES

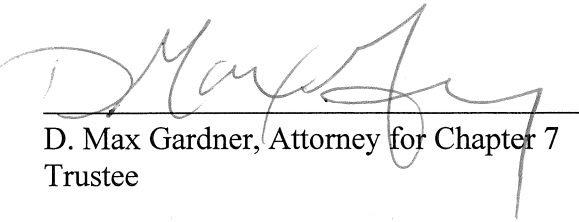
1 Debtor's Schedule "G" with exhibits is filed concurrently with this Motion as Exhibit "A".
2 Since the Chapter 7 Trustee has filed these motions, there was continued interest in the
3 acquisition of these assets expressed to the Trustee and request by parties in interest that the
4 deadline be extended. At this time, however, nothing has materialized and the Trustee has
5 determined that these assets are burdensome and of inconsequential value to the estate.

6 3. Trustee concurrently files a Notice of Intent to Abandon Interest in Real Property of
7 the Estate consistent with the provisions of Bankruptcy Rule 6007. Unless party in interest
8 objects the Trustee will file a notice of abandonment and withdraw this Motion to conclude the
9 matter.

10 4. Cause exists for granting this Motion and extending the deadline on the basis that the
11 Trustee believes this is the best manner to preserve the interest of the estate in the property by
12 allowing objections to the proposed abandonment to be made. The Trustee believes that no
13 harm or interest will occur to other parties to the executory contracts by the granting of this
14 motion. 11 U.S.C. Section 365(d)(2) allows the Court to extend the deadline.

15 WHEREFORE, Trustee moves the Court for an order extending the deadline to assume
16 and/or reject executory contracts as described herein through the time of hearing and for such
17 other and further relief appropriate under the circumstances of this case.

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19 Dated: June 1, 2022

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21 D. Max Gardner, Attorney for Chapter 7
22 Trustee
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26 FURTHER MOTION TO EXTEND DEADLINE TO ASSUME OR REJECT EXECUTORY CONTRACTS AND
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